

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
NEWPORT NEWS DIVISION**

FRANCIS W. HOOKER, JR., <i>for himself</i>	:	
<i>and on behalf of all similarly situated</i>	:	
<i>individuals</i>	:	
	:	
Plaintiff,	:	
	:	
v.	:	Civil Action No. 4:13cv3
	:	
SIRIUS XM RADIO INC.,	:	
	:	
	:	
Defendant.	:	

**MEMORANDUM IN SUPPORT OF MOTION TO WITHDRAW**

Matthew J. Erausquin, and the law firm of Consumer Litigation Associates, co-counsel for Francis W. Hooker, Jr. ("Plaintiff"), submit this memorandum in support of their motion for leave to withdraw as counsel for Plaintiff.

Attorney Erausquin and his firm, Consumer Litigation Associates, seek leave of court to withdraw from their representation of the Plaintiff in this matter. Mr. Erausquin begins his intensive Florida Bar Examination preparation on May 20, 2013 and is also currently experiencing a large docket load, including several cases that require extensive traveling for discovery and mediation. *See e.g., Henderson v. Acxiom Risk Mitigation, Inc.*, 3:12cv589 (E.D. Va.) (requiring out of state class mediation conferences); *Henderson v. Corelogic, Inc.*, 3:12cv97 (E.D. Va.) (out of state mediation set for the month of June); *Thomas v. Intellicorp Records, Inc.*, 1:12cv2443 (N.D. Ohio) (mediation continuing in Chicago); *Wilkes v. Quicken Loans, Inc.*, 2:12cv1353 (S.D. W. Va.) (pending in West Virginia and will travel for certain discovery-related matters); *Marcum*

*v. Dolgencorp, Inc.*, 3:12cv108 (E.D. Va.) (ongoing mediation before Mag. J. Novak). He is also heavily involved in litigating several other nationwide class action lawsuits against various credit reporting agencies and is leading the discovery efforts therein. *See James v Experian Information Solutions, Inc.*, 3:12cv902 (E.D. Va.); *Lopez v. Trans Union, LLC*, 1:12cv902 (E.D. Va.); and *Henderson v. Backgroundchecks.com*, 3:13cv29 (E.D. Va.); Because of this workload, including the required travel for many of these cases, and particularly as the Plaintiff continues to be represented in this Division by Mr. North's firm, it is appropriate that he withdraw from this matter. Mr. Erausquin, through Mr. North's firm, has notified the Plaintiff of his intent to seek leave to withdraw. This case is still in the early stages of litigation and Mr. Erausquin's withdrawal from this case will not impact or prejudice either party.

Therefore, Matthew J. Erausquin and the law firm of Consumer Litigation Associates respectfully request that this Court permit their withdrawal from this matter. Mr. North and Mr. Downing continue as counsel for the Plaintiff.

/s/  
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Matthew J. Erausquin, VSB No. 65434  
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**CERTIFICATE OF SERVICE**

I hereby certify that on May 14, 2013, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

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